

Musi, Merkin, Daubenberger & Clark, LLP  
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Dimitri L. Karapelou, Esquire  
PROPOSED ATTORNEY FOR DEBTOR

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>  <b>KINGDOM EMPOWERMENT INTERNATIONAL MINISTRY D/B/A KINGDOM EMPOWERMENT INTERNATIONAL MINISTRIES</b>  <i>Debtor.</i>	<b>Chapter 11 Bankruptcy No. : 24- 14289</b>
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**DECLARATION IN SUPPORT OF DEBTOR’S APPLICATION TO EMPLOY MUSI  
MERKINS, DAUBENBERGER & CLARK, LLP AND RULE 2016(B) STATEMENT**

In accordance with Bankruptcy Rules of Civil Procedure 2014 and 2016(b), I, Dimitri L. Karapelou, Esquire hereby states as follows:

1. I am an attorney and counselor at law, duly admitted to practice in the Commonwealth of Pennsylvania and in this Court.
2. I am Of-Counsel of the law firm of Musi, Merkins, Daubenberger & Clark, LLP, 21 West Third Street, Media, PA 19063.
3. Musi, Merkins, Daubenberger & Clark, LLP (“MMDC”) has extensive experience in bankruptcy, insolvency, corporate reorganization and debtor/creditor law. The firm is well qualified to represent the Debtor-in-Possession generally herein, and is willing to accept employment on the basis set forth in the annexed Application.

4. To the best of my knowledge, information and belief, neither I nor any member of my firm has any connection with the Debtor, creditors or any other party in interest or accountants except for the following:

(a) Prior to the bankruptcy, MMDC received the following funds as advance security retainers which were applied to invoices subsequently billed as indicated below:

Date Payment received	Amount received	Amount applied to services rendered before receipt	Amount applied to services rendered after receipt	Amount remaining on petition date		
Retainer November 29, 2024	\$16,738.00	\$0.00	\$3,470.50 Applied on November 29, 2024 to pay invoice for November legal services and chapter 11 filing fee	\$13,267.50		

5. Additionally, to the best of my knowledge, information and believe, neither I nor any member of my firm, does not hold any interest adverse to the above-entitled Estate which would disqualify it from representing the Debtor, and said law firm is a disinterested person as defined in 11 U.S.C. § 101(1).

6. The professionals at Musi, Merkins, Daubenberger & Clark, LLP, who are most likely to work on this bankruptcy are:

- a. Dimitri L. Karapelou - \$495.00 per hour
- b. Associates- \$375.00 per hour.

7. The Debtor intends to pay Applicant for any post-petition services rendered as authorized by the Bankruptcy Code.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Respectfully Submitted,

/s/ Dimitri L. Karapelou  
Dimitri L. Karapelou, Esquire  
Musi, Merkins, Daubenberger & Clark, LLP  
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(P) 610-891-8806  
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ATTORNEY FOR THE DEBTOR

**Date: November 29, 2024**